

AMENDMENTS TO THE DRAWINGS

The attached sheet of drawings includes changes to Figs. 3a-3c. This sheet, which includes Figs. 3a-3c, replaces the original sheet including Figs. 3a-3c. In Figs. 3a-3c, the legend "Prior Art" has been added.

Attachment: Replacement Sheet

REMARKS

Reconsideration of this application is respectfully requested in view of the foregoing amendment and the following remarks.

By the foregoing amendment, claims 1-8 have been amended, and new claims 9-14 have been added. No new matter has been added by the amendments. Thus, claims 1-14 are currently pending in the application and subject to examination.

Informal Matters

In the Office Action mailed December 13, 2006, drawings were objected to for informalities. The drawings have been amended responsive to the objections. If any additional amendment is necessary to overcome the objections, the Examiner is requested to contact the Applicant's undersigned representative.

Rejections Under 35 USC § 102 and 103

In the outstanding Office Action, claims 1, 2 and 4 were rejected under 35 USC §102(b) as being anticipated by, or in the alternative, under 35 USC § 103(a) as being unpatentable over Buynoski et al. (US 6,207,553, hereinafter, "Buynoski"), claim 3 was rejected under 35 USC §103(a) as being unpatentable over Buynoski in view of Gaynes et al. (US 6,236,115, hereinafter, "Gaynes"), and claims 5-8 were rejected under 35 USC § 103(a) as being unpatentable over Buynoski. It is noted that claims 1-8 have been amended. To the extent that the rejections remain applicable to the claims currently pending, the Applicant hereby traverses the rejections, as follows.

The Applicant respectfully submits that Buynoski is directed to non-analogous art and that the rejections based thereon are improper. The claimed invention is directed to a component of a film-forming device in which a thin film is formed on a

substrate using a film-forming material and a method of cleaning the component of the film-forming device. Beyond the illustration of a mask 5 in Figs. 2(A)-2(E), Buynoski includes no disclosure whatsoever regarding a component of a film-forming device, a method of cleaning the component of the film-forming device, or problems occurring when a thin film material falls off of a film forming device, which is a problem the claimed invention attempts to solve. As such, the disclosure of Buynoski is in no way analogous to the claimed invention, and withdrawal of the rejections based on Buynoski is requested.

Moreover, Buynoski does not disclose or suggest each and every feature of the claimed invention. In making the rejections, the Office Action asserts "Buynoski discloses a metallization layer (Figs. 2a-2e) that contains component (ILD 1) of a film-forming device (the whole device) in which a thin film (ILD 1) is formed on a substrate (1) using a film-forming material (dielectric), the component being characterized in that a large number of through holes (a1, b1, c1) each extending from the back face to the top face of the component and a film (ILD2) of the film-forming material adhered to the surface of the component." Office Action, p. 3. However, as admitted by the Office Action, the ILD1 of Buynoski is a "thin film" "contained in a metallization layer" and is not a "component of a film forming device." Moreover, an interlayer dielectric layer (e.g., ILD1) cannot, by any reasonable interpretation, be construed as a "component of a film forming device." Furthermore, elements A1-C1 of Figs. 2(A)-2(E) of Buynoski are interconnect lines "made of electrically conductive material," (see, *Buynoski*, col. 6, lines 39-50); elements A1-C1 of Buynoski are not through holes.

The Office Action further asserts that the claimed through holes each extending from the back face to the top face of the component for the penetration of a cleaning solution into a boundary between a surface of the component and a film of the film-forming material adhered thereto constitutes "an intended use" and "does not differentiate the claimed apparatus from a prior art apparatus satisfying the claimed structural limitations." Office Action, p. 3. However, as noted above, the apparatus of Buynoski does not satisfy the claimed structural limitations, as an interlayer dielectric layer of a metallization layer formed on a substrate does not, by any reasonable interpretation, read on a component used in a film forming device. Moreover, the through holes are a part of the claimed structural limitations and are not "an intended use".

The Office Action admits that Buynoski does not disclose the through holes being formed at an angle (e.g., tilted toward the horizontal). Gaynes is cited as allegedly curing this deficiency of Buynoski. However, through holes 31 of Gaynes are not holes in a component of a film forming device. Moreover, Gaynes is not cited for, nor does Gaynes cure the remaining deficiencies of Buynoski noted above.

The Applicant respectfully submits none of the applied art of record nor combination thereof discloses or suggests at least the features of a body having a back face and a top face and a large number of through holes each extending from the back face to the top face formed therein, wherein one of the back face and the top face includes a surface on which the thin film is adhered during use, and the through holes provide access from the other one of the back face and the top face to the thin film adhered on the surface, whereby a cleaning solution is permitted to penetrate into a

boundary between the surface and the thin film adhered thereon, as recited in independent claim 1, as amended.

Further, the Applicant submits none of the applied art of record nor combination thereof discloses or discloses at least the features of preparing a body of the component with through holes that extend therethrough; and immersing the body of the component into a cleaning solution to remove a film adhered to a surface of the body during use, whereby the cleaning solution enters into the through holes and penetrates a boundary between the surface of the body and the film adhered thereto, as recited in independent claim 5, as amended.

For at least these reasons, the Applicant submits that independent claims 1 and 5 are allowable over the applied art of record. As claims 1 and 5 are allowable, the Applicant submits that claims 2-4 and 6-8 and 14, which depend from allowable claims 1 and 5, respectively, are likewise allowable for at least the reasons set forth above with respect to claims 1 and 5.

New Claims 9-14

The Applicant submits that none of the applied art of record, nor combination thereof, disclose or suggests a component for use in a film-forming device in which a thin film is formed on a substrate using a film-forming material, the component of the film-forming device comprising: means for affecting formation of the thin film on the substrate, the means for affecting formation of the thin film having a surface on which the thin film is also formed during use; means for allowing penetration of a cleaning solution used to remove the thin film from the surface of the means for affecting formation of the thin film into a boundary between the surface of the means for affecting

formation of the thin film and the thin film formed thereon, as recited in independent claim 9. As such, the Applicant submits that independent claim 9 is allowable over the applied art of record. As claim 9 is allowable, the Applicant submits that claims 10-13, which depend from allowable claim 9, are likewise allowable for at least the reasons set forth above with respect to claim 9.

Claim 14 depends from claim 5. As noted above, claim 14 is allowable for at the east the reasons set forth above with respect to claim 5.

Conclusion

For all of the above reasons, it is respectfully submitted that claims 1-14 are in condition for allowance and a Notice of Allowability is earnestly solicited.

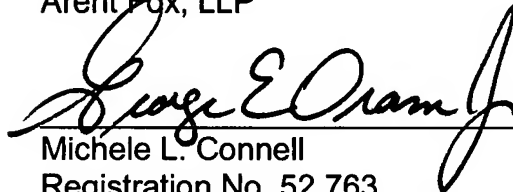
Should the Examiner determine that any further action is necessary to place this application into better form, the Examiner is invited to contact the undersigned representative at the telephone number listed below.

In the event this paper is not considered to be timely filed, the Applicants hereby petition for an appropriate extension of time. The Commissioner is hereby authorized to charge any fee deficiency or credit any overpayment associated with this

communication to Deposit Account No. 01-2300 referencing client matter number
026390-00029.

Respectfully submitted,

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Enclosures: Replacement Sheet
Petition for Extension of Time